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12 *Attorneys for Plaintiffs*

13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE DISTRICT OF NEVADA

16 JULIENNE DOW, an individual; CAROL
17 GERENSTEIN, an individual; CHERYL
HUEY, an individual; GREGORY M.
18 KOZLOWICZ, an individual; MARILYN
VALDEZ, an individual; PATRICE CATALLI,
19 an individual; SANDRA RENNEWANZ, an
individual; WILLIAM GILBERT, an
individual,

20 Case No. 2:11-cv-00662-PMP-GWF

21 Plaintiffs,

22 v.

23 LENNAR CORPORATION, DOES I-X, and
ROE CORPORATIONS I-X inclusive,

24 Defendants.

25
**JOINT STIPULATION AND
ORDER TO STAY PROCEEDINGS
AND EXTEND DEADLINES**

26
(First Request)

27 Subject to the Court's approval, Plaintiffs Julianne Dow, Carol Gerenstein, Cheryl Huey,
Gregory M. Kozlowicz, Marilyn Valdez, Patrice Catalli, Sandra Rennewanz, and William Gilbert
28 (collectively "Plaintiffs") and Defendant Lennar Corporation ("Lennar" or "Defendant")

1 (collectively the "Parties"), by and through their attorneys of record, enter into the following
2 stipulation to stay all proceedings, except for the Early Neutral Evaluation Session, for 90 days
3 and to extend deadlines, on the terms detailed below. The Parties respectfully request that the
4 Court enter an Order approving this stipulation.

5 Plaintiffs filed their Complaint on April 27, 2011, and their First Amended Complaint on
6 May 17, 2011. Lennar timely filed its Answer to Plaintiffs' First Amended Complaint on June 7,
7 2011. Pursuant to Local Rule 26-1(d), the parties are required to file a Stipulated Discovery Plan
8 and Scheduling Order by July 21, 2011.

9 Additionally, on July 11, 2011, Lennar filed its Motion to Compel Arbitration, seeking to
10 compel arbitration of six of the eight Plaintiffs' claims pursuant to their written agreements to
11 arbitrate. The deadline for Plaintiffs' response to Lennar's Motion to Compel Arbitration is
12 currently July 28, 2011.

13 Good cause exists to approve this stipulated stay of proceedings and extension of
14 deadlines. As part of this Stipulation, the Parties have agreed to exchange documents, as detailed
15 below, and believe that this exchange of documents will allow them to better evaluate the case in
16 preparation for the Early Neutral Evaluation session. Additionally, the stay of proceedings will
17 allow the Parties an opportunity to focus their efforts on engaging in discussions regarding
18 possible early resolution of the claims in this case, which discussions will be furthered by
19 participation in the Early Neutral Evaluation Session.

20 For the good cause described above, the parties stipulate, subject to the Court's approval,
21 as follows:

22 1. All proceedings in this case, except for the scheduled Early Neutral Evaluation
23 Session, are stayed for 90 days.

24 2. The Early Neutral Evaluation Session will take place, as currently scheduled under
25 the Court's Order Scheduling Early Neutral Evaluation Session, at 9:30 a.m. on Thursday, August
26 11, 2011, before United States Magistrate Judge Lawrence R. Leavitt.

27 3. The Parties have agreed to exchange documents prior to the Early Neutral
28 Evaluation Session. Specifically, Plaintiffs have agreed to provide Lennar with documents

1 showing verifiable information regarding all mitigating income received by Plaintiffs since the
2 end of their employment with a Lennar affiliate. Lennar has agreed to provide to Plaintiffs
3 information relating to the compensation of NHCs in the Las Vegas Division since the end of
4 Plaintiffs' employment with a Lennar affiliate. Prior to this exchange of documents, the Parties
5 will enter into and file an Agreed Protective Order, and will produce the foregoing documents,
6 which contain confidential financial information regarding Plaintiffs and third parties, subject to
7 the Agreed Protective Order.

8 4. The deadline for Plaintiffs' Response to Lennar's Motion to Compel Arbitration is
9 October 26, 2011.

10 5. The deadline for the Parties to conduct the Rule 26(f) Conference will be fourteen
11 (14) days following the Court’s ruling on Lennar’s Motion to Compel Arbitration.

12 6. The deadline for the Parties to file their Stipulated Discovery Plan and Scheduling
13 Order will be twenty-one (21) days following the Court's ruling on Lennar's Motion to Compel
14 Arbitration.

15 7. Lennar's stipulation to this stay of proceedings, the delay of a ruling on Lennar's
16 Motion to Compel Arbitration, and any actions taken on the part of Lennar during the stay, or at
17 any time prior to the Court's ruling on Lennar's Motion to Compel Arbitration, including but not
18 limited to any exchange of documents, and Lennar's participation in the Early Neutral Evaluation
19 Session, shall in no way waive or otherwise affect Lennar's Motion to Compel Arbitration, or its
20 rights to compel arbitration of Plaintiffs' claims as detailed therein.

22 || Stipulated to: July 19, 2011

By: /s/ Ted D. Meyer
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18 Stipulated to: July 19, 2011

19 By: /s/ Brian Blankenship (signed w/ permission)
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25 Las Vegas, Nevada 89145

26 *Attorneys for Plaintiffs*

27 Based on the foregoing Stipulation and for good cause shown, it is **ORDERED**, that:

28 1. All proceedings in this case, except for the scheduled Early Neutral Evaluation
Session, are stayed for 90 days.

1. The Early Neutral Evaluation Session will take place, as currently scheduled under
2. the Court's Order Scheduling Early Neutral Evaluation Session, at 9:30 a.m. on Thursday, August
3. 11, 2011, before United States Magistrate Judge Lawrence R. Leavitt.

1. The Parties have agreed to exchange documents prior to the Early Neutral
2. Evaluation Session. Specifically, Plaintiffs have agreed to provide Lennar with documents
3. showing verifiable information regarding all mitigating income received by Plaintiffs since the
4. end of their employment with a Lennar affiliate. Lennar has agreed to provide to Plaintiffs
5. information relating to the compensation of NHCs in the Las Vegas Division since the end of
6. 7.
7.
8.

1 Plaintiffs' employment with a Lennar affiliate. Prior to this exchange of documents, the Parties
2 will enter into and file an Agreed Protective Order, and will produce the foregoing documents,
3 which contain confidential financial information regarding Plaintiffs and third parties, subject to
4 the Agreed Protective Order.

5 4. The deadline for Plaintiffs' Response to Lennar's Motion to Compel Arbitration is
6 October 26, 2011.

7 5. The deadline for the Parties to conduct the Rule 26(f) Conference will be fourteen
8 (14) days following the Court's ruling on Lennar's Motion to Compel Arbitration.

9 6. The deadline for the Parties to file their Stipulated Discovery Plan and Scheduling
10 Order will be twenty-one (21) days following the Court's ruling on Lennar's Motion to Compel
11 Arbitration.

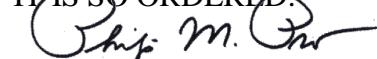
12 7. Lennar's stipulation to this stay of proceedings, the delay of a ruling on Lennar's
13 Motion to Compel Arbitration, and any actions taken on the part of Lennar during the stay, or at
14 any time prior to the Court's ruling on Lennar's Motion to Compel Arbitration, including but not
15 limited to any exchange of documents, and Lennar's participation in the Early Neutral Evaluation
16 Session, shall in no way waive or otherwise affect Lennar's Motion to Compel Arbitration, or its
17 rights to compel arbitration of Plaintiffs' claims as detailed therein.

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IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

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DATED: July 21, 2011.

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